

JOHNSON UTILITIES COMP

5230 East Shea Boulevard * Scottsdale, Arizona 8
PH: (480) 998-3300; FAX: (480) 483-7908

ORIGINAL



0000145328

Arizona Corporation Commission
DOCKETED

June 5, 2013

Steve Olea, Director
Utilities Division
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, Arizona 85007

JUN 05 2013



AZ CORP COMMISSION
DOCKET CONTROL

2013 JUN -5 P 1:37

RECEIVED

RE: Johnson Utilities Company, L.L.C.
Compliance with Decision No. 65840
Notice of Violation from ADEQ dated May 30, 2013
ADEQ Case ID: 140548 (San Tan Water Reclamation Plant, Place ID 18584)
ADEQ Case ID: 140757 (Johnson Utilities Company, Place ID 114360)
WS-02987A-99-0583; WS-02987A-00-0618; W-02234A-00-0371; W-02859A-00-0774;
W-01395A-00-0784

Dear Mr. Olea:

On May 30, 2013, I received a letter from the Arizona Department of Environmental Quality ("ADEQ") dated May 30, 2013, regarding the above subjects. A copy of the letter and Notices of Violation ("NOV") dated May 30, 2013, are attached hereto as Attachment 1. We will respond to all the requested compliance items. Our first response to NOV 140757 is attached as Attachment 2.

Should you have any questions regarding this event or would like any additional information prior to receiving our response, please do not hesitate to contact me. Thank you for your time and consideration in this matter.

Sincerely,

Greg Brown
Johnson Utilities, LLC

cc: Docket Control
Brian Bozzo, Compliance

Attachment 1



Janice K. Brewer
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

1110 West Washington Street • Phoenix, Arizona 85007
(602) 771-2300 • www.azdeq.gov



Henry R. Darwin
Director

CERTIFIED MAIL
Return Receipt Requested
May 30, 2013

7012 3050 0001 6258 1430

Case ID: 140548 & 140757

Johnson Utilities, LLC
Attention: Gary A. Drummond, Statutory Agent
1430 E. Missouri Ave. Suite B-125
Phoenix, AZ 85014

Re: Notice of Violation issued to Johnson Utilities, LLC

Dear Mr. Drummond:

This letter constitutes the monthly update on the status of Arizona Department of Environmental Quality ("ADEQ") action resulting from ADEQ's inspection of the above-referenced site on May 15, 2013, as required by A.R.S. § 41-1009(I).

The attached Notice of Violations ("NOV") are an informal compliance assurance tool used by ADEQ to put a responsible party (such as a facility owner or operator) on notice that the Department believes a violation of an environmental requirement has occurred. They describe the facts known to ADEQ at the time of issuance and cites the requirement that ADEQ believes the party has violated.

Although ADEQ has the authority to issue appealable administrative orders compelling compliance, an NOV has no such force or effect. Rather, an NOV provides the responsible party an opportunity to do any of the following before ADEQ takes formal enforcement action: (1) meet with ADEQ and discuss the facts surrounding the violation, (2) demonstrate to ADEQ that no violation has occurred, or (3) document that the violation has been corrected.

ADEQ reserves the right to take a formal enforcement action, such as issuing an administrative order or filing a civil lawsuit, regardless of whether the Department has issued an NOV. Neither ADEQ's issuance of an NOV nor its failure to do so precludes the Department from pursuing these remedies. However, the timeliness of a complete response to the notices will be considered by ADEQ in determining if and how to pursue such remedies.

Sincerely,

Daniel Czecholinski, Manager
Water Quality Utility Field Service Unit

Cc: Mr. Greg Brown, Johnson Utilities (Via email gbrown@azvision.net)

Enclosure: Inspection report with attachments

Southern Regional Office
400 West Congress Street • Suite 433 • Tucson, AZ 85701
(520) 628-6733

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Janice K. Brewer
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

1110 West Washington Street Phoenix, Arizona 85007
(602) 771-2300 www.azdeq.gov



Henry R. Darwin
Director

CERTIFIED MAIL
Return Receipt Requested

Case ID #: 140548

May 30, 2013

Johnson Utilities, LLC
Attention: Greg H. Brown
5230 E Shea Blvd
Scottsdale, AZ 85254-5750

Subject: Santan Water Reclamation Plant, Place ID 18584
200 E Hunt Hwy / Queen Creek, AZ 85143-4961

NOTICE OF VIOLATION

The Arizona Department of Environmental Quality (ADEQ) has reason to believe that Johnson Utilities, LLC as the owner/operator of Santan Water Reclamation Plant has violated a requirement of the Arizona Revised Statutes (A.R.S.), a rule within the Arizona Administrative Code (A.A.C.), or an applicable permit/license, administrative order or civil judgment. ADEQ discovered the violations alleged below during an inspection completed on May 15, 2013.

I. LEGAL AUTHORITY and NATURE OF ALLEGED VIOLATION(S)

1. Permit 43235 (105325) - 4.2 Compliance (or Operational) Monitoring

Table IC, Reclaimed Water Monitoring Table - Class A+... Parameter: Turbidity: Single reading, 5.0 NTU [maximum discharge limit during daily 24 hour periods]

According to the Excel file "Johnson Utilities San Tan Turbidity.xlsx" emailed to ADEQ by Johnson Utilities, LLC (Johnson Utilities) on May 16, the plant exceeded the permit limit for 5.0 NTU maximum turbidity. Exceedances were reported as follows: (decimal places truncated at tenths).

May 11, 2013: 51.8 NTU (Nephelometric Turbidity Units)

May 12, 2013: 108.2 NTU

May 13, 2013: 106.7 NTU

May 14, 2013: 20.3 NTU

On these dates, Johnson Utilities discharged under their Reuse Permit R105778, LTF 54459. On May 29, 2013, ADEQ received Johnson Utilities 2nd Quarter Self Monitoring Report Form (SMRF) data. The information on the SMRFs reported that Johnson Utilities did not discharge reclaimed water on May 12 and May 13, 2013. This is contrary to what was reported to ADEQ at the time of the inspection and on the "Spill/Discharge Notification Memorandum".

Johnson Utilities is authorized to discharge A+ Reclaimed Water to the San Tan Heights HOA and Johnson Ranch Golf Course.

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2. Permit 43235 (105325) - 4.2 Compliance (or Operational) Monitoring

Table IC, Reclaimed Water Monitoring Table - Class A+... Parameter: Turbidity: Single reading, 2.0 NTU [daily 24 hour average].

According to the Excel file "Johnson Utilities San Tan Turbidity.xlsx" emailed to ADEQ by Johnson Utilities on May 16, the plant exceeded the permit limit for 2.0 NTU daily average turbidity on May 10, 2013 through May 16, 2013. Exceedances were reported as follows: (decimal places truncated at tenths).

May 10, 2013: 2.1 NTU

May 11, 2013: 15.8 NTU

May 12, 2013: 37.5 NTU

May 13, 2013: 38.7 NTU

May 14, 2013: 6.4 NTU

May 15, 2013: 2.4 NTU

May 16, 2013: 2.6 NTU

On these dates, Johnson Utilities discharged under their Reuse Permit R105778, LTF 54459. On May 29, 2013, ADEQ received Johnson Utilities 2nd Quarter SMRF data. The information on the SMRFs reported that Johnson Utilities did not discharge reclaimed water on May 12 and May 13, 2013. This is contrary to what was reported to ADEQ at the time of the inspection and on the "Spill/Discharge Notification Memorandum".

Johnson Utilities is authorized to discharge A+ Reclaimed Water to the San Tan Heights HOA and Johnson Ranch Golf Course.

3. Permit 43235 (105325) - 2.2.1 Engineering Design

"The original WRP was designed as per the design report prepared by Terry Moore, P.E., Sunbelt Utility Services, L.L.C. The Phase II WRP was designed by Gregory Brown, P.E., Specific Engineering, L.L.C., dated January 27, 2005. The facility shall be constructed, operated and maintained in accordance with these design reports."

Neither the Operations and Maintenance Manual or the Contingency and Emergency Response Plan provided specific procedures operators should follow in the event of a plant power failure including the requirement to electrically restart a unit process. In this instance it was necessary to restart the aeration blowers after power was restored on May 11, 2013 but this did not occur until May 13, 2013.

4. Permit 43235 (105325) - 2.3.3. Discharge Limitations

Failure of the permittee to operate and maintain all permitted facilities to prevent unauthorized discharges pursuant to A.R.S. § 49-201(12) resulting from a failure or bypassing of BADCT pollutant control technologies including liner failure, uncontrollable leakage, overtopping (e.g. exceeding the maximum storage capacity, defined as fluid level exceeding the crest elevation of a permitted impoundment), of basins, lagoons, impoundments or sludge drying beds, berm breaches, accidental spills, or other unauthorized discharges.

According to a "Spill/Discharge Notification Memorandum" dated May 14, 2013, provided to ADEQ by Johnson Utilities, a power outage occurred over the weekend of May 11 and 12,

2013. According to the operators, after power was restored the operator on duty failed to reset the Kaeser compressors which supply aeration for the secondary treatment processes causing the turbidity exceedances in the reclaimed water that was discharged to the San Tan Heights ponds and to Johnson Ranch Golf Course. Analytical results provided by Johnson Utilities indicate the discharge exceeded the maximum discharge limit and the daily 24-hour average for turbidity due to the bypassing of the treatment process.

II. DOCUMENTING COMPLIANCE

1. Within 30 calendar days of receipt of this Notice, please submit documentation that the violation(s) never occurred, or for each parameter with a deviation from the permit limit as alleged in this Notice, a description of the measures that have been or will be taken to resolve the alleged violation.
2. Within 90 calendar days of receipt of this Notice, please submit documentation that the violation(s) never occurred, or an updated version of either the O&M manual, the Emergency Response Plan, or the Contingency Plan which provides work instructions for operators to perform the following: 1) how to reapply power after a power failure. 2) a description of which unit processes or other items which need to be restarted after electrical power is restored. 3) details on how to restore unit processes when power has been re-applied.
3. Within 30 calendar days of receipt of this Notice, please submit documentation that the violation(s) never occurred, or documentation to demonstrate the measures that will be taken to prevent unauthorized discharges resulting from failure or bypassing of the BADCT pollutant control technologies.

III. SUBMITTING COMPLIANCE DOCUMENTATION

Please send all compliance documentation and any other written correspondence regarding this Notice to ADEQ at the following address:

Arizona Department of Environmental Quality, Attention: Gregory Frech, Water Quality Utility Field Service Unit, 1110 W Washington St, Phoenix, AZ 85007 MC: 5415B-1

IV. STATEMENT OF CONSEQUENCES

1. The time frames within this Notice for achieving and documenting compliance are firm limits. Failure to achieve or document compliance within the time frames established in this Notice will result in an administrative compliance order or civil action requiring compliance within a reasonable time frame, substantial civil penalties, and/or the suspension or revocation of an

applicable permit/license. ADEQ will agree to extend the time frames only in a compliance schedule negotiated in the context of an administrative consent order or civil consent judgment.

2. Achieving compliance does not preclude ADEQ from seeking civil penalties, and/or suspending or revoking an applicable permit/license for the violation(s) alleged in this Notice as allowed by law.

V. OFFER TO MEET

ADEQ is willing to meet regarding this Notice. To obtain additional information about this Notice or to schedule a meeting to discuss this Notice, please contact Gregory Frech at (602) 771-7667.



Daniel L. Czecholinski, Manager
Water Quality Utility Field Service Unit



Gregory Frech
Water Quality Utility Field Service Unit



Janice K. Brewer
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

1110 West Washington Street Phoenix, Arizona 85007
(602) 771-2300 www.azdeq.gov



Henry R. Darwin
Director

CERTIFIED MAIL
Return Receipt Requested

Case ID #: 140757

May 30, 2013

Johnson Utilities, LLC
Attention: Greg H. Brown
5230 E Shea Blvd
Scottsdale, AZ 85254-5750

Subject: Johnson Utilities Company, Place ID 114360
LAT: 33d, 9', 37.2979" N LNG: 111d, 34', .506" W

NOTICE OF VIOLATION

The Arizona Department of Environmental Quality (ADEQ) has reason to believe that Johnson Utilities, LLC as the owner/operator of Johnson Utilities Company has violated a requirement of the Arizona Revised Statutes (A.R.S.), a rule within the Arizona Administrative Code (A.A.C.), or an applicable permit/license, administrative order or civil judgment. ADEQ discovered the violations alleged below during an inspection completed on May 15, 2013.

I. LEGAL AUTHORITY and NATURE OF ALLEGED VIOLATION(S)

1. A.A.C. R18-11-303(B)(1)(a)

Failure to ensure that Class A+ reclaimed water meets the 24-hour average turbidity standard of 2 NTUs after filtration and before disinfection.

According to the Excel file "Johnson Utilities San Tan Turbidity.xlsx" emailed to ADEQ by Johnson Utilities LLC (Johnson Utilities) on May 16, the plant exceeded the permit limit for 5.0 NTU maximum turbidity. Exceedances were reported as follows: (decimal places truncated at tenths).

May 11, 2013: 51.8 NTU
May 12, 2013: 108.2 NTU
May 13, 2013: 106.7 NTU
May 14, 2013: 20.3 NTU

On these dates, Johnson Utilities discharged under their Reuse Permit R105778, LTF 54459. On May 29, 2013, ADEQ received Johnson Utilities 2nd Quarter Self Monitoring Report Form (SMRF) data. The information on the SMRFs reported that Johnson Utilities did not discharge reclaimed water on May 12 and May 13, 2013. This is contrary to what was reported to ADEQ at the time of the inspection and on the "Spill/Discharge Notification Memorandum".

Johnson Utilities is authorized to discharge A+ Reclaimed Water to the San Tan Heights HOA and Johnson Ranch Golf Course provided it meets A+ standards.

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(520) 628-6733

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2. A.A.C. R18-11-303(B)(1)(b)

Failure to ensure that Class A+ reclaimed water meets the turbidity standard of 5 NTUs after filtration and before disinfection.

According to the Excel file "Johnson Utilities San Tan Turbidity.xlsx" emailed to ADEQ by Johnson Utilities on May 16, the plant exceeded the permit limit for 5.0 NTU maximum turbidity. Exceedances were reported as follows: (decimal places truncated at tenths).

May 11, 2013: 51.8 NTU

May 12, 2013: 108.2 NTU

May 13, 2013: 106.7 NTU

May 14, 2013: 20.3 NTU

On these dates, Johnson Utilities discharged under their Reuse Permit R105778, LTF 54459. On May 29, 2013, ADEQ received Johnson Utilities 2nd Quarter Self Monitoring Report Form (SMRF) data. The information on the SMRFs reported that Johnson Utilities did not discharge reclaimed water on May 12 and May 13, 2013. This is contrary to what was reported to ADEQ at the time of the inspection and on the "Spill/Discharge Notification Memorandum".

Johnson Utilities is authorized to discharge A+ Reclaimed Water to the San Tan Heights HOA and Johnson Ranch Golf Course provided it meets A+ standards.

II. DOCUMENTING COMPLIANCE

1. Within 5 calendar days of receipt of this Notice, please submit documentation that the violation(s) never occurred, or documentation that Johnson Utilities San Tan WRP will cease to provide reclaimed water to the San Tan Heights HOA and Johnson Ranch Golf Course until the Johnson Utilities San Tan WRP can produce Class A+ reclaimed water.
2. Within 120 calendar days of receipt of this Notice, please submit documentation that the violation(s) never occurred, or documentation that the reclaimed water from the Johnson Utilities San Tan WRP meets A+ Standards prior to delivering reclaimed water to San Tan Heights HOA or Johnson Ranch Gold Course.

III. SUBMITTING COMPLIANCE DOCUMENTATION

Please send all compliance documentation and any other written correspondence regarding this Notice to ADEQ at the following address:

Arizona Department of Environmental Quality, Attention: Gregory Frech, Water Quality Utility Field Service Unit, 1110 W Washington St, Phoenix, AZ 85007 MC: 5415B-1

IV. STATEMENT OF CONSEQUENCES

1. The time frames within this Notice for achieving and documenting compliance are firm limits. Failure to achieve or document compliance within the time frames established in this Notice will result in an administrative compliance order or civil action requiring compliance within a reasonable time frame, substantial civil penalties, and/or the suspension or revocation of an applicable permit/license. ADEQ will agree to extend the time frames only in a compliance schedule negotiated in the context of an administrative consent order or civil consent judgment.
2. Achieving compliance does not preclude ADEQ from seeking civil penalties, and/or suspending or revoking an applicable permit/license for the violation(s) alleged in this Notice as allowed by law.

V. OFFER TO MEET

ADEQ is willing to meet regarding this Notice. To obtain additional information about this Notice or to schedule a meeting to discuss this Notice, please contact Gregory Frech at (602) 771-7667.



Daniel L. Czecholinski, Manager
Water Quality Utility Field Service Unit



Gregory Frech
Water Quality Utility Field Service Unit

Attachment 2

JOHNSON UTILITIES, L.L.C.

5230 East Shea Boulevard, Suite 200 • Scottsdale, Arizona 85254
PH: (480) 998-3300; FAX: (480) 483-7908

June 4, 2013

Gregory Frech
Water Quality Utility Field Service Unit
Arizona Department of Environmental Quality
1110 W Washington St., MC: 5415B-1
Phoenix, AZ 85007

Re: Notice of Violation, Case ID #: 1140757

Dear Mr. Frech:

Johnson Utilities, L.L.C. (JU) is responding to the Arizona Department of Environmental Quality's (ADEQ) Notice of Violation (NOV), Case ID #:140757, dated May 30, 2013. The NOV alleges failure to comply with A.A.C. R18-11-303(B)(1)(a) and (b). Section II, Documenting Compliance, Item 1 requires a response within 5 calendar days of receipt of the NOV. JU received the NOV via email on Friday, May 31, 2013. Our response to Item 1 is provided below.

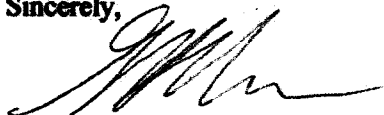
1. Within 5 calendar days of receipt of this Notice, please submit documentation that the violation(s) never occurred, or documentation that Johnson Utilities San Tan WRP will cease to provide reclaimed water to the San Tan Heights HOA and Johnson Ranch Golf Course until the Johnson Utilities San Tan WRP can produce Class A+ reclaimed water.

Date Due: June 5, 2013.

Response: Johnson Utilities provides only Class A+ water to the San Tan Heights HOA and Johnson Ranch Golf Course. JU does not provide any reclaimed water to the San Tan Heights HOA and Johnson Ranch Golf Course if Class A+ water cannot be provided. However, as we reported previously, after a power outage on Friday evening, May 10, 2013, the San Tan water reclamation plant experienced an upset when two VFDs failed to restart when power was restored. This event lead to bulking MLSS that resulted in a discharge of effluent that exceeded the turbidity limits. This event should have been corrected on Saturday by the weekend employee, but unfortunately the employee failed to do so. This employee has been dismissed by JU and is no longer working for JU. On Monday, May 13, 2012, the weekday operator found the plant in an upset mode and diverted the flow from the San Tan HOA pond to the onsite recharge facility. The blowers were manually reset and the plant started to return to its normal operating condition. Attached are the 2nd quarter SMRF pages for maximum turbidity and daily average turbidity. The data documents the plant's return to normal operation. Reclaimed water is currently being delivered to the Johnson Ranch Golf Course and recharge facility.

If you have any questions or comments, please contact me at (480) 998-3300.

Sincerely,



Gregory H. Brown, P.E.
Director of Engineering

Attachments: Johnson Utilities, 2nd Quarter SMRF, Pages 7 and 9

Facility Name:	SANTAN WATER RECLAMATION PLANT	Latitude:	33 11 6	Place ID:	18584
Contact:	Rod Spencer	Longitude:	111 35 37	LTF#:	43235 Inv. #:
Address:	2601 WEST HUNT HIGHWAY	Section:	12	Lab ID:	AZ 0004
		Township:	3	Lab Name:	Legend
		Range:	7		41369
	QUEEN CREEK, AZ. 85242	Quarter:	B		2nd. Quarter 2013

STORET: 00070 Permit Limit: AL: N/A DL: 5 AQL: N/A Min: _____ MAX: _____
TURBIDITY max Method: _____ Units: NTU

	ANALYZED	RESULTS		ANALYZED	RESULTS		ANALYZED	RESULTS
01	4/1/13	3.634		5/1/13	1.162		6/1/13	0.752
02	4/2/13	3.867		5/2/13	1.242		6/2/13	0.900
03	4/3/13	2.523		5/3/13	1.082		6/3/13	0.940
04	4/4/13	1.655		5/4/13	0.864		6/4/13	0.698
05	4/5/13	3.783		5/5/13	0.654		6/5/13	
06	4/6/13	2.003		5/6/13	0.658		6/6/13	
07	4/7/13	1.808		5/7/13	0.672		6/7/13	
08	4/8/13	2.260		5/8/13	0.777		6/8/13	
09	4/9/13	3.867		5/9/13	0.719		6/9/13	
10	4/10/13	3.958		5/10/13	4.557		6/10/13	
11	4/11/13	1.548		5/11/13	51.887		6/11/13	
12	4/12/13	1.355		5/12/13	108.260		6/12/13	
13	4/13/13	1.209		5/13/13	106.770		6/13/13	
14	4/14/13	1.357		5/14/13	20.308		6/14/13	
15	4/15/13	1.239		5/15/13	4.753		6/15/13	
16	4/16/13	1.079		5/16/13	4.830		6/16/13	
17	4/17/13	1.270		5/17/13	0.560		6/17/13	
18	4/18/13	1.107		5/18/13	0.625		6/18/13	
19	4/19/13	1.198		5/19/13	0.573		6/19/13	
20	4/20/13	0.938		5/20/13	0.648		6/20/13	
21	4/21/13	1.029		5/21/13	4.515		6/21/13	
22	4/22/13	0.992		5/22/13	0.450		6/22/13	
23	4/23/13	1.114		5/23/13	0.628		6/23/13	
24	4/24/13	1.294		5/24/13	0.507		6/24/13	
25	4/25/13	1.372		5/25/13	0.599		6/25/13	
26	4/26/13	1.244		5/26/13	0.490		6/26/13	
27	4/27/13	1.296		5/27/13	0.540		6/27/13	
28	4/28/13	0.950		5/28/13	1.854		6/28/13	
29	4/29/13	1.198		5/29/13	1.515		6/29/13	
30	4/30/13	1.261		5/30/13	0.647		6/30/13	
31				5/31/13	1.403			

SIGNATURE OF PRINCIPLE EXECUTIVE OFFICER OR AUTHORIZED AGENT _____ DATE _____

SELF MONITORING REPORT FORM
ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

Facility Name:	SANTAN WATER RECLAMATION PLANT	Latitude:	33 11 6	Place ID:	18584
Contact:	Rod Spencer	Longitude:	111 35 3	LTF#:	43235
Address:	2601 WEST HUNT HIGHWAY	Section:	12	Inv. #:	
		Township:	3	Lab ID:	AZ 0004
		Range:	7	Lab Name:	Legend
		Quarter:	B		
	QUEEN CREEK, AZ. 85242			41369	
				2nd. Quarter 2013	

Monitoring Point ID: 114123 Monitoring Name: SAN TAN W.R.P. - RECLAIMED WTR - CLASS A+
Sampling/Reporting Frequencies: Daily Monitoring / QUARTERLY

STORET: DAAVG Permit Limit: AL: N/A DL: 2 AQL: N/A Min: MAX:
DAILY AVERAGE TURBIDITY Method: Units: NTU

	ANALYZED	RESULTS		ANALYZED	RESULTS		ANALYZED	RESULTS
01	4/1/13	1.407		5/1/13	0.739		6/1/13	0.609
02	4/2/13	1.900		5/2/13	0.696		6/2/13	0.677
03	4/3/13	1.450		5/3/13	0.592		6/3/13	0.715
04	4/4/13	1.394		5/4/13	0.569		6/4/13	0.650
05	4/5/13	1.568		5/5/13	0.508		6/5/13	
06	4/6/13	1.380		5/6/13	0.488		6/6/13	
07	4/7/13	1.371		5/7/13	0.492		6/7/13	
08	4/8/13	1.377		5/8/13	0.480		6/8/13	
09	4/9/13	1.958		5/9/13	0.466		6/9/13	
10	4/10/13	1.322		5/10/13	2.110		6/10/13	
11	4/11/13	0.889		5/11/13	15.861		6/11/13	
12	4/12/13	0.796		5/12/13	37.535		6/12/13	
13	4/13/13	0.789		5/13/13	38.709		6/13/13	
14	4/14/13	0.782		5/14/13	6.481		6/14/13	
15	4/15/13	0.760		5/15/13	2.401		6/15/13	
16	4/16/13	0.785		5/16/13	1.243		6/16/13	
17	4/17/13	0.783		5/17/13	0.500		6/17/13	
18	4/18/13	0.726		5/18/13	0.538		6/18/13	
19	4/19/13	0.664		5/19/13	0.507		6/19/13	
20	4/20/13	0.600		5/20/13	0.487		6/20/13	
21	4/21/13	0.583		5/21/13	0.506		6/21/13	
22	4/22/13	0.602		5/22/13	0.403		6/22/13	
23	4/23/13	0.592		5/23/13	0.482		6/23/13	
24	4/24/13	0.645		5/24/13	0.437		6/24/13	
25	4/25/13	0.707		5/25/13	0.457		6/25/13	
26	4/26/13	0.661		5/26/13	0.447		6/26/13	
27	4/27/13	0.688		5/27/13	0.474		6/27/13	
28	4/28/13	0.638		5/28/13	0.783		6/28/13	
29	4/29/13	0.668		5/29/13	0.696		6/29/13	
30	4/30/13	0.749		5/30/13	0.529		6/30/13	
31				5/31/13	0.644			

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION I BELIEVE THE SUBMITTED INFORMATION IS TRUE ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION INCLUDING THE POSSIBILITY OF FINES AND IMPRISONMENT.

SIGNATURE OF PRINCIPLE EXECUTIVE OFFICER OR AUTHORIZED AGENT _____ DATE _____